

PLANNING INSPECTORATE EVIDENCE PACK

Working Together For Easebourne

South Downs Local Plan Proposed Submission (Regulation 19), May 2026

Purpose of this pack

This is not a general objection to development. It is an evidence-led summary of potential soundness questions arising from SDNPA's own Local Plan wording, focusing on Easebourne, Midhurst and the proposed allocations SDA22, SDA23 and SDA24.

Core question:

How can the Local Plan recognise Easebourne as a separate settlement and a historic estate village, yet treat it as part of Midhurst for planning and growth purposes, without clearly demonstrating how that approach conserves and enhances Easebourne's distinct character?

Executive Summary

This pack distils the strongest points identified from the South Downs Local Plan Proposed Submission document. It is framed for a Planning Inspectorate audience rather than as a campaign leaflet.

The issue is not whether Easebourne should never change. The issue is whether the Local Plan has shown, through proportionate evidence, that the strategy for Easebourne is justified, effective, consistent with national policy and consistent with the statutory purposes of the National Park.

The central concern

The Plan explicitly says Midhurst and Easebourne are two separate settlements, then says it is appropriate to consider them together because they share facilities. That creates the central soundness question: does proximity and shared facilities amount to evidence that a separate historic estate village should be treated as part of a neighbouring market town's growth strategy?

Why this matters to soundness

- The justification for combining the settlements appears to rest on shared facilities, not demonstrated spare capacity.
- Easebourne is recognised by the Plan as a historic estate village, with a conservation area and major Grade I heritage assets.
- The Plan carefully explains why Midhurst's post-war expansion did not harm its historic core, but does not provide an equivalent cumulative assessment for Easebourne.
- The individual Easebourne allocations contain multiple safeguards and constraints, which suggests the sites are sensitive and require stronger justification.
- The key Inspectorate question is not whether each site can be mitigated individually, but whether the overall strategy for Easebourne is justified cumulatively.

GOLD 1 - The fundamental contradiction

Source	South Downs Local Plan, page 176, paragraph 5.47
Key wording	<i>Midhurst and Easebourne are two separate settlements... Their proximity means that they share many facilities, so it is appropriate to consider them together in this Local Plan.</i>
Why this matters	This is the core issue. The Plan recognises separation, then collapses that separation for planning purposes. The justification offered is proximity and shared facilities, but the paragraph does not itself demonstrate that the two settlements have the capacity, character or infrastructure to be planned as one growth area.
Inspector question	What evidence demonstrates that combining two separate settlements for growth purposes conserves and enhances the distinctiveness of Easebourne as a historic estate village?
Soundness relevance	Potentially relevant to whether the strategy is justified and consistent with the National Park purposes.

GOLD 2 - Distinctive towns and villages are a special quality

Source	South Downs Local Plan, page 10, paragraph 3.1 / Figure 3.1
Key wording	<i>Distinctive towns and villages, and communities with real pride in their area.</i>
Why this matters	This is SDNPA's own definition of what makes the National Park special. It supports the argument that settlement identity is not a minor local preference. It is part of the National Park's recognised special qualities.
Inspector question	If distinctive towns and villages are a special quality of the National Park, how does treating Easebourne as part of Midhurst for growth purposes protect that distinctiveness?
Soundness relevance	Potentially relevant to consistency with the Plan's own spatial portrait and the statutory purpose to conserve and enhance cultural heritage.

GOLD 3 - Landscape-led planning must mean more than mitigation

Source	South Downs Local Plan, page 11, paragraph 3.2
Key wording	<i>We put the landscape at the forefront of every decision we make.</i>
Why this matters	The Plan sets a high test for development in the National Park. A landscape-led approach should shape the choice of sites, not simply add landscaping conditions after the allocation has already been made.
Inspector question	Where is the landscape-led assessment demonstrating that SDA22, SDA23 and SDA24 are the right locations for growth in and around a historic estate village?
Soundness relevance	Potentially relevant to whether the Plan is justified by proportionate evidence and consistent with national policy for protected landscapes.

GOLD 4 - Easebourne is not described as an ordinary village

Source	South Downs Local Plan, page 176, paragraph 5.50
Key wording	<i>Easebourne has a population of 1,170 people. It is a historic estate village... The core of Easebourne is a conservation area... Cowdray Park, the Priory, the Refectory and St Mary's are Grade I listed.</i>
Why this matters	The Plan itself identifies Easebourne as a small historic estate village with exceptional heritage sensitivity. This strengthens the argument that cumulative change should be assessed against the character of Easebourne itself, not absorbed into a wider Midhurst and Easebourne growth narrative.
Inspector question	Where is the evidence that the cumulative effect of existing and proposed growth conserves and enhances Easebourne's historic estate village character?
Soundness relevance	Potentially relevant to heritage, landscape, settlement identity and soundness.

GOLD 5 - The Midhurst protection test

Source	South Downs Local Plan, page 176, paragraph 5.48
Key wording	<i>Midhurst expanded significantly... These were, however, built entirely outside the historic core and had no significant impact on its historic structure and character.</i>
Why this matters	This is important because the Plan explicitly uses protection of historic character as a benchmark when describing Midhurst. It effectively says Midhurst grew, but the historic core was protected. The equivalent question must now be asked of Easebourne.
Inspector question	Has the same test been applied to Easebourne? Where is the equivalent assessment showing that SDA22, SDA23 and SDA24 will not significantly affect Easebourne's historic structure, setting and character?
Soundness relevance	Potentially relevant to equal treatment of comparable heritage considerations and whether the strategy is justified.

GOLD 6 - Shared facilities are not evidence of spare capacity

Source	South Downs Local Plan, page 176, paragraph 5.47 and paragraph 5.49
Key wording	<i>Their proximity means that they share many facilities...</i>
Why this matters	The existence of shared facilities proves that facilities exist. It does not prove spare capacity. Paragraph 5.49 lists Midhurst facilities including schools, GP surgery, pharmacy, library and leisure centre, but that is not the same as evidence that those facilities can absorb further cumulative growth.
Inspector question	Where is the evidence of spare GP capacity, school capacity, parking capacity, road capacity and public transport capacity to justify combining the two settlements for growth purposes?
Soundness relevance	Potentially relevant to whether the strategy is justified and effective.

GOLD 7 - Local evidence is expressly recognised

Source	South Downs Local Plan, page 176, paragraphs 5.51 and 5.52
Key wording	<i>The Easebourne Parish Design Statement was adopted as a Supplementary Planning Document... The Parish Priorities Statement... was taken into account... and [is a] material consideration.</i>
Why this matters	This gives local evidence formal planning relevance. It means the Parish Design Statement and Parish Priorities are not simply resident sentiment. SDNPA acknowledges that they should guide and inform development.
Inspector question	How have SDA22, SDA23 and SDA24 been tested against the Parish Design Statement and Parish Priorities Statement, and where is that assessment visible?
Soundness relevance	Potentially relevant to whether the allocations are locally distinctive, justified and effective.

GOLD 8 - Transport evidence: amber is not a green light

Source	South Downs Local Plan, page 16, paragraph 3.27
Key wording	<i>Midhurst and Easebourne are placed in the amber category of settlements with some potential to achieve sustainable mobility outcomes.</i>
Why this matters	Amber does not mean unconstrained growth. It means some potential. This matters because the Plan treats Midhurst and Easebourne as a principal settlement area while the transport evidence recognises limitations.
Inspector question	Why is the Local Plan directing significant cumulative growth towards an area where the transport evidence identifies only some potential for sustainable mobility outcomes?
Soundness relevance	Potentially relevant to effectiveness, deliverability and infrastructure capacity.

The Site Allocation Evidence

The individual site policies do not weaken the case. They add weight because they reveal that SDNPA knows these sites are constrained, sensitive or dependent on mitigation. The Inspectorate issue is whether the Plan has justified the allocation of these sites in the first place, not merely whether later planning applications might mitigate their effects.

GOLD 9 - SDA22 - the policy itself reveals edge sensitivity

Source	South Downs Local Plan, pages 185-186, SDA22
Key wording	<i>The allocation is for 9 homes. The policy requires a layout which terminates the development, and says road layouts must not facilitate access to land to the north.</i>
Why this matters	This is stronger than simply saying SDA22 is only nine homes. The Plan itself appears to recognise that the development must stop and must not become a stepping stone to further expansion. That supports the argument that this is sensitive edge-of-settlement land.
Inspector question	If SDNPA has to require the scheme to terminate the development and prevent access to further land, does that not confirm the sensitivity of this edge-of-settlement expansion?
Soundness relevance	Potentially relevant to whether the allocation is justified and whether the settlement boundary is being moved by incremental expansion.

GOLD 10 - SDA22 - more than infill

Source	South Downs Local Plan, pages 185-186, SDA22
Key wording	<i>The policy requires conservation and enhancement of the adjacent conservation area and listed buildings, project-level Habitats Regulations Assessment, protection of vegetation belts and trees, reduced vehicle speeds, minimised hardstanding and integrated parking.</i>
Why this matters	These requirements show the site is not a simple unconstrained infill site. It is a small site but with a considerable number of design, heritage, ecological and landscape safeguards.
Inspector question	Where is the evidence that the public benefit of nine additional homes outweighs the cumulative loss of countryside and potential impact on the setting of a historic estate village?
Soundness relevance	Potentially relevant to proportionality, justification and cumulative impact.

GOLD 11 - SDA23 - a highly constrained institutional development

Source	South Downs Local Plan, page 187, SDA23 and supporting text 5.62-5.64
Key wording	<i>SDA23 is allocated for a 66-bed care home or other C2 residential institution. The policy requires access onto A286 Dodsley Lane, improved pedestrian access, circulation, parking, public realm, River Rother buffering, flood risk mitigation, groundwater protection, vegetation protection and Habitats Regulations Assessment.</i>
Why this matters	This is not a straightforward village facility. The policy itself identifies a wide range of access, parking, circulation, flood, ecology and conservation issues. The stronger argument is not that a care home is unwanted, but that the Plan has not yet shown why this constrained location is the right place for a 66-bed institutional use.
Inspector question	What evidence demonstrates that this is the most appropriate location for a 66-bed institutional development, rather than simply a site that may be capable of being made acceptable through mitigation?
Soundness relevance	Potentially relevant to effectiveness, deliverability and whether the allocation is justified.

GOLD 12 - SDA23 - deliverability appears to depend on future design work

Source	South Downs Local Plan, page 188, supporting text 5.63
Key wording	<i>A holistic approach will be critical... The design process should include a review of a range of circulation options. Development designed around the assumption of retaining existing circulation arrangements would need to be justified.</i>
Why this matters	This wording is useful because it suggests existing circulation arrangements may not be adequate. It places a great deal of weight on future design work. That creates a Planning Inspectorate question about whether the allocation is sufficiently resolved and deliverable at Plan stage.
Inspector question	Has the Plan demonstrated deliverability, or is it relying on future design work to solve unresolved access, parking and circulation problems?
Soundness relevance	Potentially relevant to effectiveness and deliverability.

GOLD 13 - SDA24 - this is about changing where Easebourne ends

Source	South Downs Local Plan, page 188-189, SDA24
Key wording	<i>SDA24 is land west of Budgenor Lodge. It is allocated for 25 homes on a 3.67 hectare site. The site layout must not provide vehicular access into adjacent fields.</i>
Why this matters	SDA24 is not simply a housing number. It is a decision about the edge of Easebourne. The requirement not to provide vehicular access into adjacent fields again indicates sensitivity about further outward expansion.
Inspector question	What planning principle justifies moving Easebourne's settlement edge into this land, and how has that been tested against the historic estate village character of Easebourne?
Soundness relevance	Potentially relevant to settlement boundary change, landscape impact and justification.

GOLD 14 - SDA24 - SDNPA acknowledges landscape and heritage sensitivity

Source	South Downs Local Plan, page 189, SDA24 requirements
Key wording	<i>The policy requires conservation and enhancement of the setting of listed buildings, green infrastructure on the northern and western boundary tied to wider landscape character, transition to open countryside, bat surveys, HRA, groundwater protection, bank stability testing and unobtrusive parking.</i>
Why this matters	This is one of the strongest site points. SDNPA itself has loaded the allocation with heritage, landscape, ecology and design requirements. That does not mean the site is automatically wrong, but it does mean the allocation requires a clear and robust justification.
Inspector question	If the site requires this many safeguards to protect landscape, heritage and ecology, why was it selected for allocation over less sensitive alternatives?
Soundness relevance	Potentially relevant to site selection, sustainability appraisal and whether the allocation is justified.

Cross-Cutting Inspectorate Issues

GOLD 15 - The cumulative impact gap

Source	Derived from the Local Plan settlement strategy and allocations SDA22, SDA23 and SDA24
Key wording	<i>The Plan presents individual allocations, but residents experience the combined effect of past and proposed development.</i>
Why this matters	The most powerful point may be cumulative impact. Easebourne has already experienced development at the former Easebourne School, Egmont Road and Cowdray Works Yard. The Plan then adds SDA22, SDA23 and SDA24, while also treating Easebourne as part of Midhurst's wider growth area. The question is whether the Plan has assessed the combined effect on Easebourne's character.
Inspector question	Where is the cumulative assessment demonstrating how the combined impact of existing development, SDA22, SDA23, SDA24 and wider Midhurst growth conserves and enhances Easebourne as a historic estate village?
Soundness relevance	Potentially relevant to justification, effectiveness, heritage impact, landscape impact and infrastructure capacity.

GOLD 16 - The National Park purpose test

Source	South Downs Local Plan, page 2, Figure 1.1 and paragraph 1.6
Key wording	<i>Purpose 1 is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</i>
Why this matters	This is the higher test. The question is not merely whether harm can be mitigated. It is whether the strategy actively conserves and enhances the qualities SDNPA exists to protect.
Inspector question	How does the combined strategy for Easebourne actively conserve and enhance its natural beauty, wildlife, cultural heritage and historic estate village character?
Soundness relevance	Potentially relevant to consistency with national policy and statutory National Park purposes.

GOLD 17 - The soundness framing

Source	Planning Inspectorate soundness tests applied to the Local Plan evidence
Why this matters	For the Inspectorate, the strongest approach is not to say "we object". It is to ask whether the Plan is justified, effective and consistent with national policy. The questions above all point to the same issue: has SDNPA explained why this strategy is right for Easebourne, rather than merely possible?
Inspector question	Is the strategy for Easebourne justified by proportionate evidence, effective in infrastructure and deliverability terms, and consistent with the National Park purpose to conserve and enhance?
Soundness relevance	This should be the organising frame for any formal Regulation 19 representation.

Evidence Still Needed - Where The Next Gold May Be

The Local Plan tells us what SDNPA proposes. The examination evidence base should explain why. The next stage should test whether the evidence base actually supports paragraph 5.47 and the selection of SDA22, SDA23 and SDA24.

- Site Assessment Reports for SDA22, SDA23 and SDA24.
- Land Availability Assessment entries for CH203, CH147 and CH206.
- Sustainability Appraisal scoring and reasons for selecting these sites over alternatives.
- Settlement Facilities Study or equivalent evidence behind the shared facilities justification.
- Transport evidence behind the amber classification and any assessment of North Mill Bridge, Dodsley Lane, Easebourne Lane and cumulative network effects.
- Infrastructure evidence for GP, school, parking, highways, public transport, drainage and community capacity.
- Any background paper explaining why Midhurst and Easebourne are considered together despite being two separate settlements.
- Any cumulative heritage, landscape or townscape assessment for Easebourne as a historic estate village.

Draft Inspectorate Submission Point

Suggested central representation:

The Plan is not yet shown to be justified in relation to Easebourne. The Plan recognises Midhurst and Easebourne as two separate settlements and describes Easebourne as a historic estate village with significant heritage assets. It then treats the settlements together for planning purposes on the basis of proximity and shared facilities. The Plan does not appear to provide sufficient evidence that shared facilities equate to spare capacity, nor does it clearly demonstrate how the cumulative impact of SDA22, SDA23, SDA24 and recent development will conserve and enhance Easebourne's distinct historic estate village character.

The Inspector is therefore respectfully invited to examine whether the strategy for Easebourne is justified by proportionate evidence, whether the site allocations are effective and deliverable, and whether the Plan is consistent with the statutory purposes of the South Downs National Park.

Source List

- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, page 2, Figure 1.1 - National Park purposes and duty.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, page 10, paragraph 3.1 / Figure 3.1 - Special qualities.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, page 11, paragraph 3.2 - Landscape-led approach.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, page 16, paragraph 3.27 - Transport categorisation.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, page 176, paragraphs 5.47-5.52 - Midhurst and Easebourne settlement text.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, pages 185-186 - SDA22 Land adjacent to former Easebourne School.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, pages 187-188 - SDA23 Midhurst Community Hospital and 1-2 Rotherfield Mews.
- South Downs Local Plan Proposed Submission (Regulation 19), May 2026, pages 188-189 - SDA24 Land west of Budgenor Lodge.